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9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 NATIONAL ABORTION FEDERATION,

13 Plaintiff,

14 v.

15 CENTER FOR MEDICAL PROGRESS, et al.,

16 Defendants.
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Case No. 15-cv-03522-WHO

MOTION FOR LEAVE TO SUBMIT
AMICUS CURIAE LETTER AND
AMICUS CURIAE LETTER OF THE
REPORTERS COMMITTEE FOR
FREEDOM OF THE PRESS

MOTION FOR LEAVE TO SUBMIT *AMICUS CURIAE* LETTER

The Reporters Committee for Freedom of the Press (the “Reporters Committee”) hereby respectfully requests leave to file the attached *amicus curiae* letter brief in support of neither party in this action. The Reporters Committee believes the attached letter brief will aid the Court in resolving key issues regarding the temporary restraining order (“TRO”) that has been issued in this case.

The Reporters Committee is an unincorporated nonprofit association of reporters and editors that works to defend the First Amendment rights and freedom of information interests of the news media. The Reporters Committee has participated as a party and as *amicus curiae* in First Amendment and freedom of information litigation since 1970. The proposed *amicus* letter brief attached to this Motion supplements the arguments of the parties by addressing the appropriate standard for the issuance of injunctive relief that acts as a prior restraint on speech.

Accordingly, the Reporters Committee respectfully requests leave to submit the attached *amicus* letter.

Dated: September 3, 2015

s/Katie Townsend
Katie Townsend
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